

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

AMERICAN FEDERATION OF GOVERNMENT
EMPLOYEES, AFL-CIO,

ASSOCIATION OF ADMINISTRATIVE LAW
JUDGES, INTERNATIONAL FEDERATION OF
PROFESSIONAL AND TECHNICAL ENGINEERS
JUDICIAL COUNCIL 1, AFL-CIO,

VANESSA BARROW, GEORGE JONES, DEBORAH
TOUSSANT, and DOES 1–100,

Plaintiffs,

v.

U.S. OFFICE OF PERSONNEL MANAGEMENT, an
agency of the United States,

CHARLES EZELL, in his official capacity as Acting
Director of the Office of Personnel Management,

U.S. DOGE SERVICE f/k/a U.S. DIGITAL SERVICE,

ACTING U.S. DOGE ADMINISTRATOR,

U.S. DOGE TEMPORARY SERVICE a/k/a the
“DEPARTMENT OF GOVERNMENT EFFICIENCY,”
and

ELON MUSK, in his capacity as director of the U.S.
DOGE TEMPORARY SERVICE,

Defendants.

Case No. 1:25-cv-01237-DLC

**DECLARATION OF SOMMATTIE RAMRUP IN SUPPORT OF PLAINTIFFS’ MOTION
FOR TEMPORARY RESTRAINING ORDER**

I, Sommattie Ramrup, declare as follows:

1. I am over 18 years of age and competent to give this declaration. This declaration is based on my personal knowledge, information, and belief.

2. I am the President of the Association of Administrative Law Judges (AALJ), a labor organization and unincorporated association that represents approximately 910 Administrative Law Judges engaged in adjudication at the Social Security Administration (SSA). AALJ represents members residing throughout the United States. I am also a member of AALJ.

3. AALJ has members who, by nature of their employment with the federal government, have highly sensitive personal and employment information of themselves, family members and close associates stored by the U.S. Office of Personnel Management.

4. AALJ is a named Plaintiff in this action. The statements made in this declaration are based on my personal knowledge, materials I have reviewed, and information made available to me.

5. I am a current federal employee and have been employed by SSA for 24 years. For the last 8 years, my position has been as an SSA Administrative Law Judge. The Office of Personnel Management manages the human resources and personnel policies for the federal government. As such, it maintains personnel records for all federal employees, including my own employment records and those of all AALJ members.

6. Like many members of AALJ, I am very concerned about the security of my information in OPM's databases. Many Administrative Law Judges have been the target of threats for actions we take in our official capacities. I am personally aware of these threats because AALJ maintains records of the threats when SSA provides notice to AALJ of a threat against an administrative law judge or hearing office.

7. Because administrative law judges face threats of violence from the public, AALJ has requested that SSA pay for privacy protection software. SSA has refused. AALJ has also lobbied Congress to include administrative law judges in legislation related to judicial security.

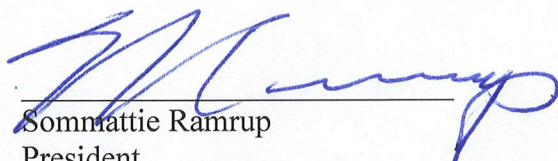
8. Having the personal addresses and other information about administrative law judges, family members and close associates at risk of being accessed by bad actors increases our threat risk and makes us, our family members, and our close associates more vulnerable.

9. My fundamental right to privacy was violated when OPM disclosed my records to DOGE without my consent.

10. Likewise, the fundamental right to privacy of AALJ's members was violated when OPM disclosed their records to DOGE without their consent.

11. Members of AALJ and I also fear that DOGE could use improperly disclosed records to retaliate against us.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on February 14, 2025.



Somnattie Ramrup
President
Association of Administrative Law Judges
New York, NY

CERTIFICATE OF SERVICE

Counsel for Plaintiffs certify that they have sent—through Defendants’ counsel Christopher Hall at the U.S. Department of Justice Federal Programs Branch —notice of this motion.

Plaintiffs’ counsel will immediately send electronically copies of the filing to Defendants’ counsel and will serve subsequent registered participants electronically and paper copies will be sent to any non-registered participants.

Dated: February 14, 2025

/s/ Rhett O. Millsaps II
Rhett O. Millsaps II